

REMARKS

This Application has been carefully reviewed in light of the Office Action mailed August 12, 2004. Claims 1-19 were pending in the Application. In the Office Action, Claims 1-19 were rejected. In order to advance and expedite the prosecution of the present Application, Applicant amends Claims 1, 6 and 14. Thus, Claims 1-19 remain pending in the Application. Applicant respectfully requests reconsideration and favorable action in this case.

In the Office Action, the following actions were taken or matters were raised:

SECTION 102 REJECTIONS

The Examiner has rejected Claims 1-2, 4-5 and 13-19 under 35 U.S.C. §102(b) as being anticipated by U.S. Patent 6,032,196 issued to Monier (hereinafter "*Monier*"). Claim 13 depends from independent Claim 6. However, the Examiner did not reject Claim 6 under 35 U.S.C § 102. Therefore, it is unclear to Applicant as to how this rejection is applied to Claim 13. Applicant presumes that the Examiner meant Claims 1-2, 4-5 and 14-19 under this 35 U.S.C. § 102 rejection. However, Applicant respectfully requests that the Examiner clarify/confirm. Applicant responds below to a presumed rejection of Claims 1-2, 4-5 and 14-19. Applicant respectfully traverses this rejection.

Of the rejected Claims, Claims 1 and 14 are independent. Applicant respectfully submits that *Monier* does not disclose or even suggest each and every limitation of independent Claims 1 and 14 as amended. For example, independent claim 1, as amended, recites "network address derived from a user's fingerprint," and independent Claim 14, as amended, recites "generating a network address derived from a user's fingerprint." The Examiner refers to column 5, lines 34-37 and 63-67 of *Monier* for its recitation of a "fingerprint" (Office Action, page 2). However, *Monier* apparently uses the term "fingerprint" simply as a "buzz word" or term to identify a value associated with a URL, in contrast to a fingerprint of a user (i.e., a print of a finger of a user). For example, *Monier* recites that "the hash table manager (A) generates a fingerprint of the specified URL" (*Monier*, column 6, lines 6-9). Thus, the "fingerprint" in *Monier* apparently has no relation to

a print based on a person's finger. Therefore, Applicant respectfully submits that *Monier* is clearly not using a biometric. Accordingly, for at least this reason, *Monier* does not anticipate Claims 1 and 14.

Claims 2, 4-5 and 15-19 that depend respectively from independent Claims 1 and 14 are also not anticipated by *Monier* at least because they incorporate the limitations of respective Claims 1 and 14 and also add additional elements that further distinguish *Monier*. Therefore, Applicant respectfully requests that the rejection of Claims 2, 4-5 and 15-19 be withdrawn.

SECTION 103 REJECTIONS

The Examiner has rejected Claims 3 and 6-12 under 35 U.S.C. §103(a) as being unpatentable over the combination of *Monier* and U.S. Patent No. 6,282,303 issued to Brownlee (hereinafter "*Brownlee*"). As discussed above, Applicant presumes that the Examiner meant to reject Claim 14 under 35 U.S.C. § 102 and Claim 13 under 35 U.S.C. § 103. However, Applicant respectfully requests that the Examiner clarify/confirm. Applicant responds below to a presumed rejection of Claims 3 and 6-13. Applicant respectfully traverses this rejection.

Of the rejected Claims, Claim 3 depends from independent Claim 1. For the reasons discussed above, independent Claim 1 is in condition for allowance. Therefore, for at least this reason, Claim 3 is also in condition for allowance, and Applicant respectfully requests that the rejection of Claim 3 be withdrawn.

Applicant amends Claim 6 to more clearly define Applicant's invention. The amendment to Claim 6 is not made based on any cited reference and, therefore, does not narrow the scope of Claim 6. Further, Applicant respectfully submits that the Examiner has failed to establish a *prima facie* case of obviousness at least because the combination of references do not disclose each and every limitation of the rejected claims and there is no suggestion or motivation to combine reference teachings. For example, independent Claim 6 recites "a network address derived from a fingerprint of a user" (emphasis added). As

described above in connection with Claims 1 and 14, the “fingerprint” relied on by the Examiner in *Monier* is not a fingerprint of a user. Therefore, neither *Monier* nor *Brownlee*, alone or in combination, discloses, teaches or suggests each and every limitation of Claims 3 and 6-13. Further, because the “fingerprint” relied on by the Examiner relates in no way to that of a user’s finger, there is no suggestion or motivation to combine *Brownlee* (which is apparently a method and apparatus for scanning a fingerprint) with *Monier*. Therefore, for at least these reasons also, the rejection of Claims 3 and 6-13 is improper and should be withdrawn.

CONCLUSION

Applicant has made an earnest attempt to place this case in condition for immediate allowance. For the foregoing reasons and for other reasons clearly apparent, Applicant respectfully requests reconsideration and full allowance of all pending claims.

No fee is believed due with this Response. If, however, Applicant has overlooked the need for any fee, the Commissioner is hereby authorized to charge any fees or credit any overpayment associated with this response to Deposit Account No. 08-2025 of Hewlett-Packard Company.

Respectfully submitted,

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